



August 18, 2016

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: NOTICE OF EX PARTE
WT Docket No. 10-208: *Universal Service Reform - Mobility Fund*

Dear Ms. Dortch:

On August 16, 2016, Tim Donovan, Courtney Neville, and I of Competitive Carriers Association (“CCA”) met with Amy Bender, Legal Advisor to Federal Communications Commission (“FCC” or “Commission”) Commissioner O’Rielly, Wireline, to discuss the above-referenced proceeding. During the meeting, CCA discussed the Commission’s efforts to reform the Universal Service Fund (“USF”) and offered recommendations for the Mobility Fund II program to ensure the Commission preserves and expands consumer-demanded wireless services in rural America.

CCA discussed adopting a new methodology to determine which portions of the country qualify as “served,” versus those that remain unserved or underserved. While Commissioner O’Rielly recently suggested the Commission use “population” as a metric for identifying areas in need of support,¹ CCA encouraged the Commission to include road miles, farm land, and Federal lands as mobility is essential for next generation technology including 5G and the Internet of Things to flourish throughout the country.² It is imperative that any methodology portray an accurate picture of the rural landscape, measuring which areas are served and which are not.³ In doing so,

¹ Michael O’Rielly, *A Path for Mobility Fund Phase II?*, Federal Communications Commission (July 25, 2016, 4:45 PM), <https://www.fcc.gov/news-events/blog/2016/07/25/path-mobility-fund-phase-ii> (“Commissioner O’Rielly Blog”).

² For example, new telehealth technologies are connecting consumers in rural and hard to reach areas with urban physicians, and precision agriculture is transforming the ability of American farmers with limited resources to deliver productivity gains and environmental sustainability

³ See Letter from Sens. Wicker (R-MS), Manchin (D-WV), Baldwin (D-WY), Blunt (R-MO), Burr (R-NC), Capito (R-WV) Daines (R-MT), Ernst (R-IA), Fischer (R-NE), Gardner (R-CO), Heitkamp (D-ND), Johnson (R-WI), King (I-ME), Klobuchar, (D-MN), McCaskill (D-MO), Moran (R-KS), Peters (D-MI), Roberts (R-KS), Rubio (R-FL), Tillis (R-FL), Vitter (R-LA), Warner (D-VA), Wyden (D-OR), Cochran (R-MS), Boozman (R-AR), Kirk (R-IL), U.S. Senate, to The Hon. Tom Wheeler, Chairman, Federal Communications Commission (July 11, 2016), *available at*

CCA reiterated that funding should be made available to meet the Commission's goal of expanding mobile broadband networks to portions of the country that are currently unserved, while ensuring that rural areas that are served in part because of USF support are not stranded or do not experience services turned down.⁴

CCA looks forward to continued work with the Commission to ensure the universal availability and maintenance of modern wireless networks capable of providing advanced mobile broadband service to all Americans. This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules. Please do not hesitate to contact me with any questions or concerns.

Respectfully submitted,

/s/ Rebecca Murphy Thompson

Rebecca Murphy Thompson
EVP & General Counsel
Competitive Carriers Association

cc (via email): Amy Bender

<http://www.wicker.senate.gov/public/index.cfm/press-releases?ID=31B66AB0-57A7-4937-90BE-A5A31B6CF516> ("Senate Mobility Fund II Letter").

⁴ If necessary, to avoid flash cuts, CCA recommends the FCC implement an extended phase down period for USF legacy support. See *Ex Parte* Letter from Rebecca Murphy Thompson, General Counsel, CCA, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 10-208 (filed Nov. 16, 2015); see also *Ensuring Intermodal USF Support for Rural America Before the S. Comm. on Commerce, Sci., and Transp. Subcomm. on Commc'ns, Tech., Innovation, and the Internet*, 114th Cong. (2016) (statement of Steven K. Berry, CEO & President of Competitive Carriers Association).